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U.S. Environmental Protection Agency
Region III (3HW24)
841 Chestnut Street
Philadelphia Pennsylvania 19107

Attn: Ms. Sherry Lee Gallagher (3HW24)
Remedial Project Manager

Re: **Elizabethtown Landfill Superfund Site
SCA Services of Pennsylvania, Inc.
Response to Comments Submitted by the
Masonic Homes of Elizabethtown on the
U.S. EPA Proposed Remedial Action Plan**

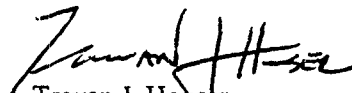
Ms. Gallagher:

This letter is submitted as a response by SCA Services of Pennsylvania, Inc.(SCA) to the comments to the U.S. Environmental Protection Agency (EPA) Proposed Remedial Action Plan (PRAP) submitted by the Masonic Homes of Elizabethtown, Pennsylvania.

The contention in the comments submitted by the Masonic Homes that the proposed remedy for the site is based upon data which contains "fundamental errors" is incorrect and unsupported by the Administrative Record. The Masonic Homes' comments are based upon a limited and biased review of the site investigatory data, which does not adequately consider the extensive knowledge gathered regarding this site. The Remedial Investigation (RI) and Feasibility Study (FS) for this site were conducted with full EPA oversight and in accordance with the EPA approved Work Plan and EPA guidance, and in our view are complete and more than sufficient for remedy selection.

Due to the misleading nature of the Masonic Homes' comments, we felt compelled to provide this response. Our specific responses to the Masonic Homes' comments are attached.

For SCA Services of Pennsylvania, Inc.,


Trevan J. Houser
Remedial Projects Manager

c: Charlie Howland, EPA

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SCA Services of Pennsylvania, Inc.
Responses to Comments submitted by the Masonic Homes of Elizabethtown on the
U.S. EPA Proposed Remedial Action Plan for the
Elizabethtown Landfill Superfund Site

Introduction

The Masonic Homes submitted comments on the Proposed Remedial Action Plan (PRAP) for the Elizabethtown Landfill Superfund Site in West Donegal Township, Pennsylvania which were prepared by GeoServices, Ltd. of Harrisburg, Pennsylvania. The central point of these comments was that the proposed remedial alternative selected by the U.S. Environmental Protection Agency (EPA) is not sufficiently protective of the Masonic Homes' water supply and the supporting documents used in its determination were inadequate.

The Masonic Homes indicates in its comments that the reports used in preparation of the PRAP contain "fundamental errors" and that the PRAP does not adequately consider protection of its water supply. It contends that the Proposed Plan should be modified to include provisions for "water supply treatment and assurance of continued water supply"; but in support of these claims it has made a number of misleading and unsubstantiated claims. In addition to these unsubstantiated claims, the Masonic Homes' seem to focus on the issue of protection of the quantity and quality of its drinking water supply. Specifically, the comments address three main issues:

- 1). Errors in Technical Reports: The Masonic Homes argues, without factual evidence, that the technical reports prepared during the Remedial Investigation and Feasibility Study (RI/FS) are in error and contain fundamental flaws in interpretation.
- 2). Water Quality: The Masonic Homes argues that the PRAP should include well-head treatment for its wells to ensure the quality of its drinking water supply, but ignores that similar protection would be provided by the proximal groundwater extraction system.
- 3). Water Quantity: The Masonic Homes suggests that an alternate water supply should be provided to ensure the long-term adequacy of water quantity available to its system, without any technically supportable basis for claiming that the quantity would be affected.

Regarding the Technical Reports

SCA takes great exception to the contention by the Masonic Homes that the RI/FS is inadequate. The Reports for this site were prepared in compliance with the EPA approved Work Plan and in accordance with EPA guidance. SCA was held to very stringent standards during preparation of these reports and EPA demanded full compliance with NCP protocol. The EPA incorporated all data generated by previous investigations of the site, in addition to the RI, in order to ensure all available data was considered. Consequently, the EPA's decision is founded upon extensive hydrogeologic information gathered for over a decade. The data available for this site overwhelmingly supports the conclusions presented in the technical reports.

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The Masonic Homes' comments also claim that the technical reports used in preparation of the PRAP contained insufficient information to accurately predict the long-term protectiveness of the preferred remedy. It appears that the data allegedly missing from the reports is information from aquifer pump tests from the Masonic Homes' property downgradient of the site. This data however is not "missing", rather it is not required for successful completion of an RI, where the nature and extent of contamination are characterized. This data is typically gathered during the pre-design investigation (PDI) in order to provide a basis for design of the selected remedial alternative. As EPA is aware, SCA agreed to conduct this testing, while EPA worked separately to evaluate the RI, in order to be ahead of schedule regarding information needed for the proposed groundwater extraction system design. It was not completed however due to SCA's inability to gain access to the Masonic Homes' property.

The other work elements proposed by the Masonic Homes (ie - analysis for inorganic ions, evaluation of relationship of metals to groundwater flow, physical re-evaluation of the burn pit area and re-assessment of the issue of hot spots in general) would not provide information relevant to the achievement of the site remedial goals. To second guess the work conducted by EPA at the last minute appears to be driven by motives unrelated to furtherance of site remedial objectives.

Regarding Water Quality

SCA understands that the Masonic Homes has concern for its water supply. However, we feel that its comments fail to recognize several fundamental aspects of the RI/FS and the PRAP, and therefore its concerns are unfounded.

Most importantly, the RI/FS data clearly indicate that the site does not currently pose any risk to the Masonic Homes from use of its existing groundwater supply wells. Contrary to the unsubstantiated statements made in its comments, these wells were sampled and found to be free of site-related contaminants. Despite the fact that the future risks are purely theoretical, the EPA preferred remedy includes groundwater extraction component G-3: Source control with migration management and wetlands monitoring. The groundwater extraction system will be specifically designed to capture contaminants and preclude their entry into the Masonic Homes wells. With no current risk determined to exist, this remedy will certainly not exacerbate the current situation nor create any additional risk to the Masonic Homes' wells. The speculation that the potential exists for unacceptable future impact is unfounded.

The FS actually considered protection of groundwater supply wells through a number of alternatives. The EPA preferred remedy selected in the PRAP includes monitoring and groundwater extraction utilizing both distal (migration management) and proximal (source control) components. This alternative is conservative and fully protective of downgradient water wells. Alternative 6 in the FS, which was not chosen by EPA but which SCA believes should be selected in the ROD, includes groundwater extraction component G-2: Source control with wetlands monitoring. This component also includes the well-head treatment component, desired by the Masonic Homes', for downgradient wells potentially impacted by site-related contaminants. With this in mind, the Masonic Homes' argument that sufficient consideration was not given to protection of its water supply in these reports is simply untrue.

Finally, the Masonic Homes' comment regarding concentrations of manganese detected in well EM400 is misleading. The concentration detected in this well is comparable to that found in the background well (EU25) established by EPA for the RI. The Masonic Homes contention that this concentration is site-related is not supported by the data. This argument also fails to recognize that other site-related contaminants have not been detected in this well.

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Regarding Water Quantity

The Masonic Homes third concern seems to be that if groundwater extraction is implemented at the site, it may affect the quantity of water available to its well. The RI/FS data clearly indicates that the Masonic Homes' wells should not be affected by the groundwater extraction components evaluated in the FS. The hydrogeologic model of the site and surrounding area prepared as part of the RI/FS, indicate that the flow regimes on both sides of the valley effectively act as "separate" systems. Pumping from the proximal extraction system component would not impact the Masonic Homes' wells.

Assuming that groundwater extraction is ultimately required, the available data indicate that the aquifer transmissivity is sufficient to accommodate the withdrawal of groundwater required to supply the Masonic Homes' system, even if both the distal and proximal components are in operation. The data required to completely confirm this was to be obtained during the proposed aquifer pump test agreed to by SCA, but which did not occur due to unreasonable compensation demands by the Masonic Homes for access to its property. This data will likely be obtained during the pre-design investigation during the remedial design. However, to the extent the Masonic Homes wishes to cooperate, any data it currently has regarding these wells could be utilized.

Summary

The Elizabethtown site has been the subject of extensive investigation and modeling for over a decade. The knowledge regarding this site by the preparers of the RI/FS documents is overwhelming. The RI/FS documents were prepared in full accordance with the EPA approved Work Plan, the NCP, and EPA guidance.

The RI/FS data clearly indicate that no risk currently exists from use of the Masonic Homes' wells. More over, the implementation of the EPA preferred remedy would certainly not exacerbate this situation. The FS considered several alternatives which would adequately protect the Masonic Homes' wells from potential future impacts. In our view, Alternative 6 from the FS is superior because it provides well-head treatment and eliminates any uncertainty regarding protection of the Masonic Homes' water supply.

The potential for negative impact to the quantity of water available to the Masonic Homes' well system is unlikely. The RI/FS data have shown that the hydrogeologic flow regimes on both sides of the valley effectively act as two "separate" systems. The pumping from the groundwater extraction system is not expected to have any significant impact on the flow near the Masonic Homes' wells.

For the reasons cited above, the Masonic Homes' contention that the EPA PRAP is unprotective and the supporting documents are flawed and contain "fundamental errors" is unjustified. Rather the EPA preferred remedy is conservatively protective and SCA believes that other alternatives in the FS achieve similar protection in equal time and at less cost.

SCA respectfully requests that the U.S. EPA consider these comments during its preparation of the Record of Decision for the Elizabethtown Landfill site. SCA remains available to meet with U.S. EPA and/or other concerned citizens regarding this site and the proposed remedial actions.

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